

## Vicki Skoczynski

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**From:** Bonnie Houlihan  
**Sent:** Wednesday, July 1, 2020 3:02 PM  
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**Subject:** Andrew L. Colborn v. Netflix, et al. (201915.001)  
**Attachments:** Rule 26 initial disclosures.pdf

Dear Counsel:

Attached please find Plaintiff's Rule 26 Initial Disclosures with regard to the above matter.  
Thank you.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION

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ANDREW L. COLBORN,  
Plaintiff

NETFLIX, INC.,  
CHROME MEDIA, LLC, f/k/a  
SYNTHESIS FILMS, LLC,  
LAURA RICCIARDI, and  
MOIRA DEMOS,

Case No. 19-CV-484

Defendants.

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**PLAINTIFF'S RULE 26 INITIAL DISCLOSURES**

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Plaintiff, Andrew L. Colborn, by and through his undersigned attorneys, the Law Firm of Conway, Olejniczak & Jerry, S.C., hereby make the following initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1). The Plaintiff reserves his right to amend these disclosures and to provide additional information during the course of discovery.

1. Witnesses: Parties must disclose the name, and if known the address and telephone number, of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses. Parties must also identify the subjects of such information.

RESPONSE: Witnesses include, but are not limited to, Andrew Colborn, Moira Demos, Laura Ricciardi, employees of Chrome Media, all individuals who worked on the editing and production of Making a Murderer I and II. Addresses are being withheld at this time to protect the privacy of the parties. Investigation is on-going and plaintiff reserves the right to supplement this disclosure.

2. Documents: Parties must provide a copy of, or a description by category and location of, all documents, electronically stored information and tangible things that the

disclosing party may use to support its claim or defenses. Except in cases with very few documents, most parties will disclose categories and location rather than producing all the documents. Parties must provide or describe all disclosable documents in their possession, control, or custody.

RESPONSE: Copies of MAM I episodes (Dkt. # 120-1 to 120-9), the State Avery trial transcripts (Dkt. # 120-28 to 120-36, Dkt. # 132-1 and 132-2, and also at <http://www.stevenaverycase.org/jurytrialtranscripts/>), Colborn video deposition of October 13, 2005 (Dkt. # 129-1), the transcript from the Colborn video deposition of October 13, 2005 (Dkt. # 120-14). Discovery and investigation are ongoing, and Plaintiff reserves the right to supplement this disclosure.

3. Damages Computations: Each party must provide a computation of any category of damages claimed by that party. Each party must also produce the non-privileged documents supporting the computation, including documents bearing on the nature and extent of injuries suffered.

RESPONSE: Plaintiff has sustained general damages to his reputation in an amount to be determined by the jury, as well as severe emotional distress, resulting in damages in an amount to be determined by the jury. Punitive damages may also be awarded in an amount to be determined by the jury. Plaintiff is in the process of calculating out-of-pocket, special, and other damages. Plaintiff reserves the right to supplement this disclosure.

4. Insurance: Each party must provide all insurance policies that may provide coverage for part or all of any judgment that might be entered in the action.

RESPONSE: This information is in the possession of Defendants.

Dated this 15 day of July, 2020.

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.  
Attorneys for Plaintiff

By: 

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